

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCOLLUM, §  
STEPHANIE KINGREY, and §  
SANDRA McCOLLUM, §  
individually and as §  
heirs at law to the §  
Estate of LARRY GENE §  
McCOLLUM, §

Plaintiffs, §

VS §

CIVIL ACTION NO.  
3:12-cv-02037

BRAD LIVINGSTON, JEFF §  
PRINGLE, and the TEXAS §  
DEPARTMENT OF CRIMINAL §  
JUSTICE, §

Defendants. §

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ORAL AND VIDEOTAPED DEPOSITION OF

ANANDA D. BABBILI

FEBRUARY 7, 2013  
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ORAL AND VIDEOTAPED DEPOSITION OF

ANANDA D. BABBILI, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on the 7th day of February, 2013, from 9:52 a.m. to 12:50 p.m., before TINA TERRELL BURNEY, CSR in and for the State of Texas, reported by machine shorthand, at the Hutchins State Jail, 1500 E. Langdon Road, Dallas, Texas 75241, pursuant to the Federal Rules of Civil Procedure.

DEFENDANT'S  
EXHIBIT

3

McCollum, et al.  
Brad Livingston, et al

Ananda D. Babbili  
February 07, 2013

1 A. Because the patient was not in front of me to  
2 pull the record for me to see and evaluate.

3 Q. To your knowledge, did anyone do any sort of  
4 intake on Mr. McCollum's medical problems prior to his  
5 admission to the Hutchins Unit?

6 A. Yes.

7 Q. Who?

8 A. The nurse who does the intake information when  
9 they arrive on the unit.

10 Q. Who's that, do you know?

11 A. Ms. Connel. That's her signature right down  
12 there.

13 Q. And just so I'm clear, that signature is  
14 under -- and I apologize, I'm going to -- it's Babbili?

15 A. Yes.

16 Q. And that's you, sir. And then underneath,  
17 there's a signature, and that's Connel, C-O-N-N-E-L?

18 A. Uh-huh.

19 Q. Okay. Was she there -- okay. So she did the  
20 initial intake?

21 A. Uh-huh.

22 Q. Is there any intake notes from her?

23 A. This is another intake paper.

24 Q. Was this part of Exhibit 3, or is it a  
25 separate document?

**WRIGHT WATSON & ASSOCIATES**

McCollum, et al.  
Brad Livingston, et al

Ananda D. Babbili  
February 07, 2013

1 A. It's part of Exhibit 3.

2 Q. Part of Exhibit 3. Okay. All right. Is  
3 Exhibit 3 the intake summary that Ms. Connel did?

4 A. The intake summary is the one page. You're  
5 holding it in your right hand.

6 Q. Okay. So Exhibit 2 is both your order and  
7 Nurse Connel's intake?

8 A. Yes.

9 Q. Okay. And this is the sum and substance of  
10 the intake that Nurse Connel, and for that matter, the  
11 whole Hutchins Unit did, on Mr. McCollum prior to his  
12 admission to the jail?

13 A. Yes.

14 Q. Okay. To your knowledge, did Nurse Connel see  
15 Mr. McCollum?

16 A. I do not know that.

17 Q. Okay. Should Nurse Connel have seen  
18 Mr. McCollum?

19 A. The majority of the patients arriving at  
20 Hutchins are seen by the nurse.

21 Q. Another way to answer that question might be,  
22 yes, Nurse Connel should have seen Mr. McCollum prior to  
23 admitting him to the jail. Is that fair?

24 A. That is fair.

25 Q. Okay.

**WRIGHT WATSON & ASSOCIATES**